

PLACER DOME U.S.

Manager of the CORTEZ JOINT VENTURE

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January 27, 2000

EIS001195

Ms. Wendy R. Dixon, EIS Project Manager M/S 010
U.S. Department of Energy
Office of Civilian Radioactive Waste Management Yucca Mountain Site Characterization Office P.O. Box 30307
North Las Vegas, NV 89036-0307

FFB 07 2000

Re: Draft Environmental Impact Statement (DEIS) for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada

Dear Ms. Dixon:

Placer Dome U.S. Inc. and Cortez Gold Mines appreciates the opportunity to provide these comments on the Draft EIS for the Yucca Mountain Facility. Our concern focuses on the issues surrounding the Carlin Rail Corridor transportation option as they relate to our active mining operation in Crescent Valley. We would like to emphasize that at this point in time Placer Dome U.S. Inc. and Cortez Gold Mines have no position on, either in support of or against, the proposed action and DEIS.

Cortez Gold Mines is a large surface mining operation located in the southern end of Crescent Valley. Facilities and operations are located in both the eastern and western portions of the valley, with haulage and access roads linking both sides of the valley. Ancillary facilities include several infiltration basin galleries, some of which are located near the center of the valley. Attendant to the operations is a substantial private land position, along with numerous mining claims on public lands managed by the Bureau of Land Management. Part of our private land holding includes the 48,000 acre Dean Ranch, located in the center of the valley. The maps describing the Carlin rail corridor provided in the DEIS and those obtained at the December 9, 1999 public meeting in Crescent Valley depicts the corridor crossing portions of both the Dean Ranch and Cortez Gold Mines areas. Naturally, we are concerned about the impact that the rail corridor may have on our operations, land ownership, mining claims and future exploration.

It is our understanding that the Carlin rail corridor is but one of five proposed rail routes and that other transportation modes are also being considered. It is also our understanding that once a mode and route are selected, a new and separate NEPA (National Environmental Policy Act) process will be initiated to analyze them.

Recognizing this, it is our intent to provide the following points for the record so that if the Carlin rail corridor is ultimately selected, they are appropriately considered.

Local Site Geotechnical and Resource Information

Because of the nature of our business and the required permitting processes, Cortez Gold Mines has extensively studied the physical environment in the area. As such, we have detailed geologic, hydrologic, and other information which may be of interest to DOE should the Carlin route be seriously considered. We would be willing to discuss and perhaps share this data with DOE to help avoid or mitigate potential impacts.

Reasonable Routing

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We would expect DOE to work closely with Cortez Gold Mines in designing a reasonable route through our properties that minimizes impacts to not only our existing facilities and operations but, also to future potential orebodies and associated facilities. We would also expect an assurance that DOE would relocate the rail track at no expense to Cortez Gold Mines should future operational needs require. This is important, as portions of the identified corridor cross some of our mining claims that have not yet been explored for mineral potential. One solution that may be considered by DOE is to cooperatively fund deep condemnation drilling in selected areas.

Right-of-Way Issues

As mentioned above, the corridor crosses a significant portion of our private lands and mining claims on public lands. Obviously, this raises several concerns related to right-of-way, access, land use, water rights, mining, exploration and agricultural activities such as grazing. We would expect DOE to work closely with us on resolving any conflicts that may arise in these areas.

Rail Corridor Crossings

As stated above, a large mine haulage road would be intersected by the corridor. A crossing designed to safely accommodate loaded mine haulage trucks with a gross vehicle weight of 1,000,000 pounds must be incorporated. Additionally, other multiple crossings will be needed to provide access for ancillary mining facilities/activities and ranching needs. Safety measures tailored to both light vehicles and the large mining equipment must also be provided for at all crossings.

Additionally, we would require the installation of large culverts at strategic locations to allow for the future installation of dewatering pipelines that feed our infiltration galleries.

Rail Line Usage

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Should the Carlin route be selected and constructed, Cortez Gold Mines would want to ensure that it has the ability to use the rail line for off-site shipments of ore and the shipment of materials to the site.

Community Input

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Cortez Gold Mines employs approximately 400 workers at their operation, and a significant number of them live in the Crescent Valley area. We would like to stress the importance of DOE taking into consideration the interests and concerns of all the residents of Crescent Valley, as well as the rest of northeast Nevada. We believe that it is very important that their points of view be heard and their issues in regards to this project be addressed.

We appreciate the opportunity to provide the DOE with these comments. Should you have any questions, please contact Steve Schoen at (775) 468-4408 or Jim Collord at 468-4431 at your convenience.

Respectfully Submitted,

Stephen M. Schoen

Environmental Coordinator

Placer Dome U.S. Inc.

Jim Collord

Environmental and Lands Superintendent

Cortez Gold Mines

Cc:

Jozette Booth - EIS Transportation Manager

Bill Upton Tony Jensen

Crescent Valley Town Board Eureka County Commissioners Lander County Commissioners